

Ira Spiro (sued as Robert Ira Spiro)
10573 West Pico Blvd. #865
Los Angeles, CA 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com
Defendant, a Self-Represented Attorney

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. 2:23-cv-01298-JLS-BFM

**DEFENDANT SPIRO'S REPLY TO
PLAINTIFF'S OPPOSITION (ECF
267) TO DEFENDANT SPIRO'S
MOTION (ECF 263) TO DISMISS
PLAINTIFF'S FOURTH AMENDED
COMPLAINT (ECF 257)**

**Motion Before:
Hon. Magistrate Judge
Brianna Fuller Mircheff**

Case Assigned to:
Hon. Josephine L. Staton and
Hon. Magistrate Judge
Brianna Fuller Mircheff

1 Defendant Spiro submits this Reply to Plaintiff's Opposition to Defendant
2 Spiro's Motion to Dismiss Plaintiff's Fourth Amended Complaint

3
4 Dated: April 22, 2025

5 _____/s/_____
6 Ira Spiro (sued as Robert Ira Spiro)
7 Defendant, a Self-Represented Attorney
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MEMORANDUM OF POINTS AND AUTHORITIES

A. THE FIRST CAUSE OF ACTION, FOR VIOLATION OF RICO, SHOULD BE DISMISSED FOR LACK OF STANDING.

To briefly review, a RICO cause of action requires that plaintiff:

(1) plead **injury to Plaintiff’s property** or business and

(2) plead allegedly **fraudulent communications** with the **particularity required by RICO cases.**

(3) Plaintiff must also **identify what each particular defendant specifically did wrong**, rather than “grouping defendants together without identifying what the particular defendants specifically did wrong.” (Magistrate Judge Mircheff’s Report and Recommendation (ECF 132, p.10, lns. 3-5).

(4) **It is the plaintiff’s burden to establish standing.** (*Carrico v. City & County of San Francisco* 656 F3d 1002, 1006 (9th Cir. 2011).)

B. FIRST CAUSE OF ACTION: PLAINTIFF FAILS TO SATISFY RICO’S REQUIREMENT TO PLEAD HARM THAT QUALIFIES AS INJURY UNDER RICO.

1. Plaintiff Fails to Allege Harm that Qualifies as Injury Under RICO.

(a) RICO complaint must allege injury to plaintiff’s property or business.

(b) But not every type of claimed harm qualifies and an injury under RICO. **Lost opportunity for financial gain, or risk of financial loss, do not qualify as injury under RICO.** (*Chaset v. Fleer/Skybox International*, 300 F.3d 1083, 1087 (9th Cir. 2002); *Canyon County v. Syngenta Seeds, Inc.*, 519 F.3d 969, 972 (9th Cir. 2008); *First Nationwide Bank v. Gelt Funding Corp*, 27 F.3d 763, 768-70 (2d Cir. 1994); *In re Taxable Mun. Bond Sec. Litig.*, 51 F.3d 518 at 521-22 (5th Cir. 2005).)

Plaintiff’s opposition claims that *Chaset* and *Canyon County* are “inapposite”. (Opposition, (ECF 267, p. 7, lns. 26-28.). The opinions in those cases show that

1 Plaintiff is quite obviously wrong. *Chaset v Fleer/Skybox International*, 300 F.3d
2 1083, 1087 (9th Cir. 2002) holds: “a RICO plaintiff only has standing if, and can
3 only recover to the extent that, he has been injured in his business or property by
4 [reason of] the conduct constituting the violation.” [Internal citations and quotation
5 marks omitted.]

6 In addition, *Chaset* holds as follows: “We agree with the district court that
7 **[p]laintiffs do not allege that they received something different than precisely**
8 **what they bargained for:** six to twenty [baseball] cards in a pack with a **chance**
9 that one of those cards may be of Ken Griffey, Jr.¹ Injury to mere expectancy
10 interests or to an ‘intangible property interest’ is not sufficient to confer RICO
11 standing.” [Emph. added.] The plaintiffs there did not get a Ken Griffey, Jr. card in
12 the packs they bought, but getting a Griffey, Jr. card was a mere expectancy.

13 Plaintiff Hill is no different from the plaintiffs in *Chaset*. He received what he
14 paid for (or partly paid for), three years of legal education at Peoples College of
15 Law, and that is what he got, plus summer courses the school did not even charge
16 for. He complains (falsely) about his supposedly lost opportunity to get a degree, but
17 getting a degree was only an expectancy, i.e. an opportunity contingent on
18 completing his required J.D. studies. Thus it was not an injury under RICO.

19 Plaintiff also claims he lost “educational investment and professional access.”
20 (ECF 267, p. 9, lns. 1-2, where he applies his argument also to *First Nationwide*
21 *Bank v. Gelt Funding*.) Plaintiff, a habitual writer of vague, undefined terms, never
22 explains what “educational investment” means. If he means tuition, Plaintiff’s
23 argument fails, just as the Plaintiff in *Chaset* failed – Plaintiff got what he paid for.
24 If by “educational investment” he means his studying for PCL classes, that
25 obviously is not “business or property” and cannot qualify as a RICO loss. If he
26 means he didn’t get the law degree he was studying for, that is an expectation, and a
27

28 ¹ Ken Griffey, Jr. is considered one of the greatest baseball players ever.

1 contingent one, contingent on his completing his fourth year at PCL, which he
2 refused to attend when it was offered to him by PCL with approval of the State Bar,
3 as shown in the Motion to Dismiss at ECF 263, p. 11, lns. 1-7 and 16-20.)

4 *Canyon County v. Syngenta Seeds, Inc.*, 519 F.3d 969, 972 (9th Cir. 2008) is
5 the other case Plaintiff claims is “inapposite.” Hardly. The case holds: “Our circuit
6 [the Ninth] requires that a plaintiff asserting injury to property allege concrete
7 financial loss. Financial loss alone, however, is insufficient. Without a harm to a
8 specific business or property interest [typically determined by state law] there is no
9 injury to business or property within the meaning of RICO.” [Internal citations and
10 quotation marks omitted.]

11 Another case on the point cited in the Motion to Dismiss, *In re Taxable Mun.*
12 *Bond Sec. Litig.*, isn’t even mentioned in Plaintiff’s opposition.

13 He does refer to *First Nationwide Bank v. Gelt Funding Corp.*, 27 F.3d 763,
14 768-70 (2d Cir. 1994). That case supports Plaintiff on these points. It holds:

15 “[A]s a general rule, a cause of action does not accrue under RICO until the
16 amount of damages becomes clear and definite. [27 F.3d at 768] In this case,
17 the loss [plaintiff] FNB would suffer as to those loans FNB has not finally
18 foreclosed cannot yet be determined. Only when FNB’s actual loss becomes
19 clear and definite will the claims be ripe for suit. Until that time, FNB lacks
20 standing under RICO to assert claims as to those loans [27 F.3d at 769].”
21

22 **2. In the First Cause of Action Plaintiff Fails to Allege Fraudulent**
23 **Communications with the Particularity Required by RICO.**

24 Plaintiff’s RICO cause of action is based on claimed mail or wire fraud. But a
25 RICO complaint must plead its mail or wire fraud allegations with a demanding
26 level of particularity, under the standards of Federal Rule of Civil Procedure 9(b).
27 Under that rule, the complaint must:
28

- (1) “at minimum, describe the predicate acts with some specificity” and
- (2) “state the time, place, and content of the alleged communications
perpetrating the fraud.”

(*Midwest Griding Co. v Spitz*, 976 F.2d 1016, 1020 (7th Cir. 1992) [internal citations and quotation marks omitted].)

Plaintiff’s Fourth Amended Complaint does not contain a single paragraph that meets these two requirements. Plaintiff makes a very brief, perfunctory effort to argue that he pled these requirements with particularity. He says so very little about the supposed particularity of his Fourth Amended Complaint, even though the Fourth Amended Complaint contains 63 paragraphs of allegations followed by 116 pages of exhibits and other materials. The RICO cause of action misleadingly appears to cover 22 pages, quite a lot for a single cause of action, but it really is much longer, because it incorporates 146 additional paragraphs (at ¶ 152).

Plaintiff’s argument that he pled with particularity is only 36 lines long and refers to only 5 paragraphs of the Fourth Amended Complaint as examples of his “particularity,” **paragraphs 84, 123, 138, 148, and 149** (ECF 267, p. 9, lns. 24½ - 26½) . But even these paragraphs Plaintiff points to do not plead with specificity.

Paragraph 84 states the date when Defendant Spiro did something, but that something is not a fraudulent communication. It states that Defendant Spiro approved Plaintiff to work a number of hours at \$15 per hour, and adds that “email exchanges revealed inconsistencies in Defendant Spiro’s accounting.”

Inconsistencies in accounting – not misrepresentations or fraud.

Paragraph 123, astonishingly, says nothing specific at all. It reads in full: “As a direct and proximate result of Defendants’ fraudulent actions and operation of the RICO Enterprise, Plaintiff has suffered substantial damages including, but not limited to, loss of educational opportunities, financial expenditures on tuition and related costs, severe emotional distress, and significant impairment of professional reputation and career progression.

1 **Paragraph 138** is more of the same, nothing specific at all. Not a single
2 specific event, not a single date, not a single time, not a single place.

3 **Paragraph 148** is just like paragraph 138, nothing specific at all. Not a single
4 specific event, not a single date, not a single time, not a single place.

5 **Paragraph 149** – one need only read its four brief lines:

6 “149. As a direct result of Defendants’ racketeering activities, Plaintiff
7 suffered specific financial losses, including approximately \$55,000 in tuition,
8 significant delay and impairment of professional licensure and earning
9 potential, and substantial emotional distress directly caused by reliance upon
10 Defendants’ fraudulent misrepresentations.”

11 (The “\$55,000” is obviously false. Tuition at the school was \$5000 per year.
12 Plaintiff claims delay in his education, but not 11 years.)
13

14 **C. THE SECOND CAUSE OF ACTION, FOR VIOLATION OF THE**
15 **UNRUH CIVIL RIGHTS ACT, SHOULD BE DISMISSED BASED ON**
16 **CALIFORNIA LAW GOVERNING UNACCREDITED LAW SCHOOLS**
17 **AND BASED ON DEFENDANT’S SJUDICIALLY NOTICED FACTS.**

18 **1. The Second Cause of Action (Unruh Act) Should be Dismissed on**
19 **the Basis of California Law Governing Unaccredited Law Schools.**

20 Section VI of Plaintiff’s Opposition addresses the Unruh Act claim. It agues
21 (at ECF 267, p. 16, lns. 1- 11½):

22 “Defendant repeatedly refers to Peoples College of Law (PCL) as a
23 ‘four-year program’ ... This characterization ... appears designed to divert
24 the Court from the central and undisputed fact: **Plaintiff met and exceeded**
25 **the required unit threshold** for the award of a Juris Doctor degree **after**
26 **three years of coursework**, regardless of whether the State Bar deemed him
27 eligible to sit for the bar exam. ... Plaintiff earned more than the number of
28

1 academic units required for graduation under PCL's own policies." [Emph.
2 added.]

3 Under two different sets of California laws, Plaintiff is wrong about this. He
4 is also wrong about PCL's requirements.

5 California law requires that a student study four years to receive a J.D.:

6 The first set of laws is the California statutes. **Business and Professions**
7 **Code section 6060 requires that the minimum number of units for a J.D. must**
8 **be satisfied over a period of four years.** Its subdivision (e)(2)(A)(1) provides that
9 "To be certified to the Supreme Court for admission and a license to practice law, a
10 person ... shall have ... [s]tudied law diligently and in good faith **for at least four**
11 **years** ... In a law school that is authorized or approved to confer professional
12 degrees and requires classroom attendance of its students for a minimum of 270
13 hours a year." [Emph. added.] At all times PCL was a law school within the
14 category of law schools described in the final clause quoted above.²

15 The second set of laws is the Rules of the State Bar of California. They
16 include rules governing law schools in California. The Bar's rules on unaccredited
17 law schools are in Title 4 Division 3, under the heading "Unaccredited Law
18 Schools." PCL was an unaccredited law school. Those rules can be found at
19 https://www.calbar.ca.gov/Portals/0/documents/rules/Rules_Title4_Div3-UnAcc-

20
21 ² Section 6060(e) also allows other types of work to qualify, but Plaintiff does
22 not claim to have satisfied them, and as a matter of fact he has not. The others are
23 (1) a J.D. from a law school accredited by the California Committee of Bar
24 Examiners or the A.B.A (PCL has never been so accredited); (2)(A)(ii) education at
25 an institution in another state or country; (2)(B) study in law office; (2)(C) study in a
26 judge's chambers; (2)(D) instruction from a correspondence school [PCL was not a
27 correspondence school]; (2)(E) a combination of methods in paragraph (2). Note
28 that California is unique in authorizing law schools that are not accredited by the A.B.A.

1 [Law-Sch.pdf](#). Rule 4.204 provides that all types of unaccredited law schools must
2 require four years of study. Subdivision (J) of the rule reads:

3 “(J) An ‘unaccredited law school’ is a correspondence, distance-learning, or
4 fixed-facility law school operating in California that is not accredited by the
5 Committee [California Committee of Bar Examiners].

6 (1) A “correspondence law school” is a law school that conducts
7 instruction principally by correspondence. A correspondence law
8 school must require at least 864 hours of preparation and study per year
9 **for four years.**

10 (2) A “distance-learning law school” is a law school that conducts
11 instruction and provides interactive classes principally by technological
12 means. A distance-learning law school must require at least 864 hours
13 of preparation and study per year **for four years.**

14 (3) A “fixed-facility law school” is a law school that conducts its
15 instruction principally in physical classroom facilities. A fixed-facility
16 law school must require classroom attendance of its students for a
17 minimum of 270 hours a year **for four years.**

18 Plaintiff is also wrong in claiming that PCL’s own rules do not require four
19 years of study. PCL’s rules included the following: “**Section 5. Requirements for**
20 **Graduation and Certification to Take Bar Exam.** As of the end of the student’s
21 fourth year courses, the student must have satisfied all the following requirements in
22 order to be permitted to advance graduate with a J.D. degree and be certified to take
23 the California Bar Exam. ... The student must have completed 270 hours (18 units)
24 minimum per year in each of the student’s four years.” (PCL Handbook, pp. 24-25.)
25 (PCL’s rules were in a comprehensive Handbook, which was on the PCL website.
26 Copies of pages 24-25 are attached as Exhibit A. Plaintiff requests judicial notice of
27 them. The Fourth Amended Complaint refers to the Handbook at paragraph 38, on
28 page 72 in a paragraph numbered 4, and in Exhibit 10, paragraph 15.

1 **2. The Second Cause of Action (Unruh Act) Should be Dismissed on**
2 **the Basis of Defendant’s Judicially Noticed Facts.**

3 The Opposition criticizes the use of judicial notice in the Motion to Dismiss,
4 but it does so in a way that is very difficult to understand. Plaintiff seems to think
5 that the Motion to Dismiss seeks judicial notice of documents rather than facts.
6 (ECF 267, p. 11, lns. 21½ -24.) He is wrong about that. Judicial notice, of course, is
7 notice of facts, not documents. Of course, facts do usually appear in documents –
8 how could a motion or anything filed with the Court present facts if not on a
9 document, whether electronic or paper. And sometimes it is the existence of the
10 document and what it says, rather than the truth of what it says, that is the subject of
11 judicial notice – for example rules, laws, and admissions by a party.

12 Section VI of the Opposition is where Plaintiff criticizes judicial notice in the
13 Motion to Dismiss. But Section VI does not refer to any specific document or fact
14 that Plaintiff objects to. Nowhere in the entire opposition does Plaintiff refer to any
15 specific document he objects to taking judicial notice of. Judicial notice of a
16 document should be granted if the opposing party does not dispute judicial notice of
17 the document (See *Perkins v LinkedIn Corp.*, 53 F.Supp.3d 1222, 1241 (N.D. Cal.
18 2014), granting judicial notice of documents the opposing party did not dispute.)

19 The Motion to Dismiss does request judicial notice the facts in its Exhibit 1.
20 That exhibit is a proper subject of judicial notice under the rule on judicial notice,
21 Federal Rule of Evidence 201(b)(2). That is because the Exhibit 1 documents are
22 emails to and from Plaintiff, or copied to plaintiff. In one case (the last) an email
23 between a very high State Bar official, Natalie Leonard, and Defendant Spiro,
24 showing Ms. Leonard’s official’s email address, which is still her email address to
25 this day. Plaintiff does not deny that the emails were sent and received.

26 The Motion to Dismiss also request judicial notice of the facts in its Exhibit 2,
27 which are communications about the transcripts of Nancy Popp, a former PCL
28 student. (ECF 263, p. 11, ln. 26 to p.12, ln. 4.) Those are proper subjects of judicial

1 notice under Rule 201(b)(2), because the Exhibit 2 documents set out facts that “can
2 be accurately and readily determined from sources whose accuracy cannot
3 reasonably be questioned.” The communications themselves are such sources.
4 Again, Plaintiff does not deny that the emails were sent and received.

5 The Motion to Dismiss also requests judicial notice of the facts in its Exhibits
6 3, 4, 5 and 6. (ECF 263, p. 12, Ins. 17-26 nothing p. 13, ln 2.) Those, too, are proper
7 subjects for judicial notice. The documents in those exhibits set out facts that “can
8 be accurately and readily determined from sources whose accuracy cannot
9 reasonably be questioned.” Exhibit 3 is an official report by the State Bar of
10 California. Exhibit 4, is an official announcement by the President of Peoples
11 College of Law seeking applicants for a new President, thus it obviously was
12 publicized and contains, on the last page, an email address to reply to. Exhibit 5 is a
13 tax return of Peoples College of Law. Exhibit 6 is a profit and loss statement for
14 PCL. Plaintiff does not deny that any of these are not proper for judicial notice.

15 The Motion to Dismiss also requests judicial notice of its Exhibit 7. It is the
16 declarations page of PCL’s directors and officers liability insurance policy, with the
17 logo of the insurer on it.

18 The motion also requests judicial notice of its Exhibit 8, a series of emails
19 between Plaintiff and Defendant Spiro that constitute the Local Rule 7-3 meeting
20 and conferring between Plaintiff and Defendant Spiro for the Motion to Dismiss.
21 Plaintiff can hardly dispute that the statements in the emails were made and sent,
22 and he does not deny it.

23
24 **D. THE TWO NEGLIGENCE CAUSES OF ACTION SHOULD BE**
25 **DISMISSED, BECAUSE DEFENDANT SPIRO IS IMMUNE FROM THEM.**

26 Plaintiff argues that the two causes of action for negligence should not be
27 dismissed because the statute providing the immunity, Corporations Code section
28 5047.5(b), “contains express exceptions for fraud, willful misconduct, and gross

1 negligence, all of which are pled with supporting detail.” (ECF 267, p. 12, Ins. 4-6.)
2 But Defendant Spiro asserts the immunity statute against **causes of action for**
3 **negligence**. Those causes of action are **named by Plaintiff** as causes of action for
4 negligence. He does not name them causes of action for fraud, willful misconduct,
5 or gross negligence. Plaintiff should not be allowed to mislead the Court and the
6 Defendants as to what causes of action he is pleading.

7 Perhaps more importantly, Plaintiff writes: “Spiro argues Plaintiff’s negligent
8 supervision claim fails because Plaintiff alleges intentional misconduct elsewhere.
9 That is not the law. [¶] That is not the law. [Yes, the sentence is set out twice in a
10 row.] Courts **routinely permit plaintiffs to plead claims in the alternative,**
11 **including negligence alongside intentional torts.”** (ECF 267, p. 13, ln. 27 to p.14,
12 ln. 2) [Emph. added].)

13 Based on this statement by Plaintiff, that he is pleading negligence and
14 intentional torts in the alternative, both of the negligence causes of action (Third and
15 Fourth) should be struck, because they violate the Court’s order of March 27, 2025,
16 dismissing the Third Amended Complaint. (ECF 248.) Paragraph 12 of that Order,
17 on page 3, orders Plaintiff as follows:

18 “To be clear, any claim that has been dismissed without leave to amend ...
19 may not be reasserted in the Fourth Amended Complaint. Nor may any new
20 claims or parties be added.”

21 In defiance of that order, Plaintiff, according to his own statement that he is
22 pleading intentional torts in the alternative, has included in his Fourth Amended
23 Complaint claims that were previously dismissed **without leave to amend**. The
24 Third Amended Complaint contained the following causes of action:

25 I. Equal Protection Violation Under The 14th Amendment

26 II. Violation Of The Unruh Civil Rights Act (California Civil Code § 51)

27 III. Title VI of the Civil Rights Act Of 1964 - Racial Discrimination In Education

28 IV. RICO - Damages Under Racketeer Influenced And Corrupt Organizations Act

V. Conspiracy

VII Negligence And Negligence Per Se

VII. Negligent Hiring, Retention, And Supervision

VIII. Violation Of Title IX of the Education Amendments of 1972

The Order dismissing the Third Amended Complaint (ECF 248) dismissed, **without leave to amend**, Plaintiff's causes of action I, III, V and VIII. Plaintiff alleged all four of them as intentional torts. The Third Amended Complaint contains the following allegations in those four causes of action dismissed without leave to amend:

I. contains the following: "This cause of action arises from the Defendants' systematic and deliberate failure to provide African American students, including the Plaintiff, with equal protection" (§ 132).

III. contains the following: This cause of action incorporates paragraph 132, quoted above, alleging "systematic and deliberate" conduct.

V. contains the following: "Defendants conspired to deprive the Plaintiff of his civil rights, The Defendants' actions were designed to harm the Plaintiff and prevent him from achieving his educational and professional goals. (§ 201)

VIII. contains the following: "Defendants engaged in sex-based retaliation ... Defendant Gonzalez, assisted by others including Spiro, Pena, Gillens, Silberger, DeuPree, and Franco, engaged in unlawful conduct such as the unauthorized recording of videos, denial of student services, and interference with Plaintiff's business relationships and duties as a corporate officer." (§ 248.)

E. PLAINTIFF SHOULD NOT BE ALLOWED TO AMEND TO FILE WHAT WOULD BE HIS SIXTH COMPLAINT.

Plaintiff has now filed five complaints, the initial one and four amended ones. All were dismissed involuntarily except, *so far*, the present Fourth Amended Complaint. The orders dismissing the others are: ECF 37 dismissing the initial

1 complaint; ECF 45 dismissing the First Amended Complaint; ECF 145 dismissing
2 the Second Amended Complaint; and ECF 248, p. 2, ln. 18, dismissing the third
3 amended complaint. That should be all the latitude Plaintiff allowed to Plaintiff. The
4 Court should put an end to it now.

5
6 **F. PLAINTIFF’S LOCAL RULE 7-3 CONTENTIONS WERE**
7 **REJECTED BY THE COURT IN ITS APRIL 15, 2025 ORDER (ECF 259)**

8 The first four pages of Plaintiff’s Opposition are arguments based on his view
9 that Local Rule 7-3 requires the moving party to send him in writing facts and law
10 supporting the motion. The Court rejected those arguments in Judge Mircheff’s
11 order of April 15, 2025, (ECF 269).

12
13 **G. CONCLUSION**

14 The Fourth Amended Complaint should be dismissed with prejudice, without
15 leave to amend.

16
17 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

18 “The undersigned party certifies that this brief contains 2875 words, which
19 complies with the word limit of L.R. 11-6.1.

20 Respectfully submitted,

21 April 22, 2025

22 _____/s/_____
23 Ira Spiro (sued as Robert Ira Spiro)
24 Defendant, a Self-Represented Attorney
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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On April 22 2025, I served the document described as **DEFENDANT SPIRO'S REPLY TO PLAINTIFF'S OPPOSITION (ECF 267) TO DEFENDANT SPIRO'S MOTION (ECF 263) TO DISMISS PLAINTIFF'S FOURTH AMENDED COMPLAINT (ECF 257)** on the interested parties in this action by placing: [] the original [xx] true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R.G. Hill
119 Vine Street
Belton, TX 76513

☒ **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

☒ **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed April 22, 2025 at Los Angeles, California.

Ira Spiro
Type or Print Name

/s/

Signature

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